BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF HAWAII

In the Matter of the Application of

HAWAIIAN ELECTRIC COMPANY, INC.

HAWAII ELECTRIC LIGHT COMPANY, INC.

MAUI ELECTRIC COMPANY, LIMITED

For Approval of the Advanced Meter Infrastructure

(AMI) Project and Request to Commit

Capital Funds, to Defer and Amortize

Software Development Costs, to Begin

Installation of Meters and Implement Time-Of-Use

Rates, for Approval of Accounting and Ratemaking

Treatment and other matters.

LIFE OF THE LAND'S

RESPONSE TO HECO'S REQUEST FOR A SECOND DELAY

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CERTIFICATE OF SERVICE

HENRY Q CURTIS
VICE PRESIDENT FOR CONSUMER ISSUES

KAT BRADY VICE PRESIDENT FOR SOCIAL JUSTICE

76 North King Street, Suite 203 Honolulu, HI 96817 phone: 808-533-3454 henry.lifeoftheland@gmail.com Aloha Commissioners,

The 2008 Energy Agreement, co-signed by Hawaiian Electric Company ("HECO") and the Division of Consumer Advocacy of the Hawai'i Department of Commerce and Consumer Affairs ("Consumer Advocate") promised a bold new approach that would transform the amount of indigenous renewable energy deployed on the grid.

On December 1, 2008 Hawaiian Electric Company ("HECO") filed the Advanced Meter Infrastructure ("AMI") application with the Public Utilities Commission ("Commission") (Docket 2008-0303).

The HECO Application noted: "Drivers for AMI implementation in Hawaii include significant developments in the evolution and availability of AMI-related technologies" (p.6) "The AMI communications and smart metering infrastructure provides a foundation for the implementation of Smart Grid technology" (p.7) "Advanced Metering Infrastructure is a critical component of a number of important aspects of the Clean Energy Initiative." (p.8) "It is important for the HECO Companies to proceed now with the AMI Project" (p.28)

On January 20, 2010 Life of the Land filed a timely Motion to Intervene. HECO filed a Motion in Opposition on January 27, 2010, arguing in part that "LOL has not demonstrated ... that ... [it] will not ...delay the proceeding" (p.2-3)

On February 13, 2009, the Public Utilities Commission ("Commission") granted intervention to Life of the Land ("LOL"), Hawaii Renewable Energy Alliance ("HREA") and the Hawaii Solar Energy Association ("HSEA").

On June 5, 2009 HECO responded to Information Requests: "The preferred installation time for all three Companies is 2 years." (HECO Response to CA-IR-2, p.15) "Pilot testing used to be common. But it is costly and incurs delay,

and the maturity of available AMI systems obviates the need for pilot testing unless the utility is pressing the state of the art." (HECO Response to CA-IR-19 p.15) (emphasis added)

On August 28, 2009 HECO requested that the Evidentiary Hearing be delayed from the week of September 21, 2009, to the week of June 21, 2010.

On April 9, 2010 HECO opened a Smart Grid docket for a portion of O'ahu (2010-0062). According to HECO, this is an unrelated docket.

On May 4, 2010 HECO proposed a second delay in the AMI docket: "Hawaiian Electric and Sensus have agreed that an extended pilot testing phase is necessary before committing to a full AMI system deployment" (p.5) The pilot project would last 18 months (p.7; p.14).

We eagerly anticipate actually seeing large-scale penetration of low-climateimpact indigenous renewable energy resources. We pray that the extended delay in this docket is not used as an excuse to delay the high penetration of renewable energy resources onto the grids.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy by hand delivery of the foregoing Response to HECO's Request by Life of the Land, in PUC Docket Number 2008-0303, upon the following parties. I have hand delivered the original and 8 copies to the PUC, and sent electronic copies to the emails below representing the parties listed below.

CARLITO CALIBOSO, CHAIR HAWAII PUBLIC UTILITIES COMMISSION 465 S King St. Suite 103 Honolulu, HI 96813

DEAN NASHINA
EXECUTIVE DIRECTOR
DIVISION OF CONSUMER ADVOCACY, DCCA
P.O. Box 541
Honolulu, HI 96809

DARCY L. ENDO-OMOTO VICE PRESIDENT HAWAIIAN ELECTRIC COMPANY P.O. Box 2750 Honolulu, HI 96840-0001

DEAN MATSUURA MANAGER, REGULATORY AFFAIRS HAWAIIAN ELECTRIC COMPANY P.O. Box 2750 Honolulu, HI 96840-0001

MARK DUDA
PRESIDENT
HAWAII SOLAR ENERGY ASSOCIATION
P. O. Box 37070
Honolulu, HI 96837

WARREN S. BOLLMEIER II PRESIDENT HAWAII RENEWABLE ENERGY ALLIANCE 46-040 Konane Place, #3816 Kaneohe, HI 96744

I emailed this filing to the following email addresses:

dean.matsuura@heco.com,Dean.Nashina@dcca.hawaii.gov,jon.s.itomura@dcca.hawaii.gov,Lane.H.Tsuchiyama@dcca.hawaii.gov,mark@dephawaii.com,pkikuta@goodsill.com,scott.seu@heco.com,twilliams@goodsill.com,wsb@lava.net,hawaii.puc@hawaii.gov

May 11, 2010 Honolulu, Hawai'i

HENRY Q CURTIS
VICE PRESIDENT